

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS, AUSTIN DIVISION

NICOLETTE D. PAGE,
Plaintiff,

v.

UNIVERSITY OF TEXAS AT AUSTIN,
Defendant.

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CASE NO. 1:24-cv-01249-DAE

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE
TO FILE AMENDED COMPLAINT**

TO THE HONORABLE SENIOR UNITED STATES DISTRICT JUDGE:

Plaintiff requests leave of Court under FED. R. CIV. P. 15(a)(2) to file her First Amended Complaint, which is attached as Exhibit 1 to this motion. Plaintiff filed this case in state court, where the pleading standard is more lenient than in federal court. Defendant removed the case to federal court and then filed a Motion for Judgment on the Pleadings asserting that Plaintiff's live pleading is deficient in various respects. Plaintiff seeks leave to amend her pleading to address those alleged deficiencies, which were raised by Defendant for the first time in its Motion for Judgment on the Pleadings. Defendant does not oppose this request.

Respectfully submitted,

DEATS DURST & OWEN, PLLC

/s/ Matt Bachop

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Attorney for Plaintiff

CERTIFICATE OF CONFERENCE

This is to certify I conferred with counsel for Defendant, Ms. Terri Abernathy, concerning the relief sought by this motion, and Ms. Abernathy stated that the relief sought is not opposed.

/s/ Matt Bachop
Matt Bachop

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on counsel for Defendant, Terri Abernathy, Terri.Abernathy@oag.texas.gov, OFFICE OF THE ATTORNEY GENERAL, P.O. Box 12548, Capitol Station, Austin, Texas 78711-2548, by the Court's CM/ECF system on this 4th day of April, 2025.

/s/ Matt Bachop
Matt Bachop